

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF ENVIRONMENTAL QUALITY
P.O. BOX O, JUNEAU, AK 99811-1800

Telephone No.
(907) 465-2653

February 28, 1991

Ms. Sally Marquis
Water Quality Standards Coordinator
U.S. Environmental Protection Agency
Region X, WD-139
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED
MAR 07 1991

OCEAN PROGRAMS SECTION
EPA - REGION 10

Dear Ms. Marquis:

Thank you for your letter responding to my November 30, 1990 summary of information on the site-specific criteria proposal for Point Woronzof and the department's procedures for establishing site-specific criteria. You summarized the basis for the Environmental Protection Agency's (EPA) position that formal rulemaking and EPA approval are required for any modification of water quality criteria under 18 AAC 70.025. While we do not fully agree with this position, we wish to work closely with EPA to develop any necessary amendments to this regulatory procedure to allow the Department to modify water quality criteria up to ambient levels without the need for formal rulemaking. As I explained in my November 30 letter, we feel this option is granted to Alaska in EPA's previous approval of the water quality standards in 1986.

We are encouraged by EPA's recently published policy guidance - "Metals Analytical Methods for Use With Water Quality Criteria" - which allows states the option of using a dissolved or acid soluble analytical method to evaluate ambient compliance with criteria. Your letter states that Region X will approve procedures consistent with this policy. This approach will allow the state and EPA to address the Point Woronzof discharge without the need for regulatory changes.

Water quality data provided the department by the Anchorage Water and Wastewater Utility, as part of their petition for establishing site-specific criteria, indicate that dissolved ambient concentrations of copper, chromium, lead, mercury, zinc and nickel in Cook Inlet adjacent to the Point Woronzof outfall are below water quality criteria for each respective metal. Public notice of the petition was issued in February 1990. This information, coupled with the calculated effluent dilution of 180:1 to the boundary of the proposed Zone of Initial Dilution (ZID), indicates that the discharge from the Point Woronzof facility will comply with state water quality standards. A copy of this information is attached. Therefore, a major condition of issuing a federal wastewater discharge permit under Section 301(h) of the Clean Water Act -- that a discharge into saline estuarine waters can only occur where



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ambient water quality is higher than applicable water quality standards -- is met for the Point Woronzof facility.

Since ambient waters meet the state's water quality criteria, establishing site-specific criteria adjacent to the Point Woronzof facility is not necessary. No public notice is required from the state. With this determination, EPA is now free to continue processing the federal discharge permit application for Point Woronzof. This letter should provide sufficient basis for you to proceed. The department's Southcentral Regional Office (563-6529) is available to assist you in developing specific conditions of the draft discharge permit.

In the coming months, I look forward to EPA's assistance in helping the state develop clarifying language in our water quality regulations which will allow site-specific criteria modification without the need for formal rulemaking in all cases. I am confident we can reach agreement on such language.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Redburn", with a stylized, flowing script.

Douglas R. Redburn
Chief
Water Quality Management

Enclosure

cc Rick Albright, EPA
Carla Fisher, EPA
Kris Warren, AWWU
Floyd Damron, CH2M Hill

MEMORANDUM

CHM HILL

TO: Douglas R. Redburn/ADEC

COPIES: Sally Marquis/EPA
Kris Warren/AWWU

FROM: Floyd J. Damron/ANC *FJD*

DATE: February 5, 1991

SUBJECT: Point Woronzof WWTP NPDES/301(h) Renewal

PROJECT: ANC26264.A1

Per your request we have reviewed the available receiving water dissolved metals data for the six metals that have been considered for site specific criteria (Cr+6, Cu, Hg, Ni, Pb, and Zn). Receiving water samples were taken in February and August, 1990, and analyzed for dissolved metal concentrations. Using this data we calculated the resulting metal concentrations at the edge of the proposed ZID (180:1 dilution). For this calculation we used the highest receiving water dissolved metal concentration and the highest effluent metal concentration for each of the six metals. In all cases, the proposed ZID boundary metal concentration is calculated to be lower than receiving water standards. This is shown on the attached figure.

The proposed ZID boundary concentration of copper came the closest to the receiving water standard. 2.6 ug/l is 93 percent of the 2.9 ug/l standard. This resulted from an effluent sample with 180 ug/l of copper, an unusually high effluent concentration for this facility. Even with this high concentration, the standard would not have been exceeded.

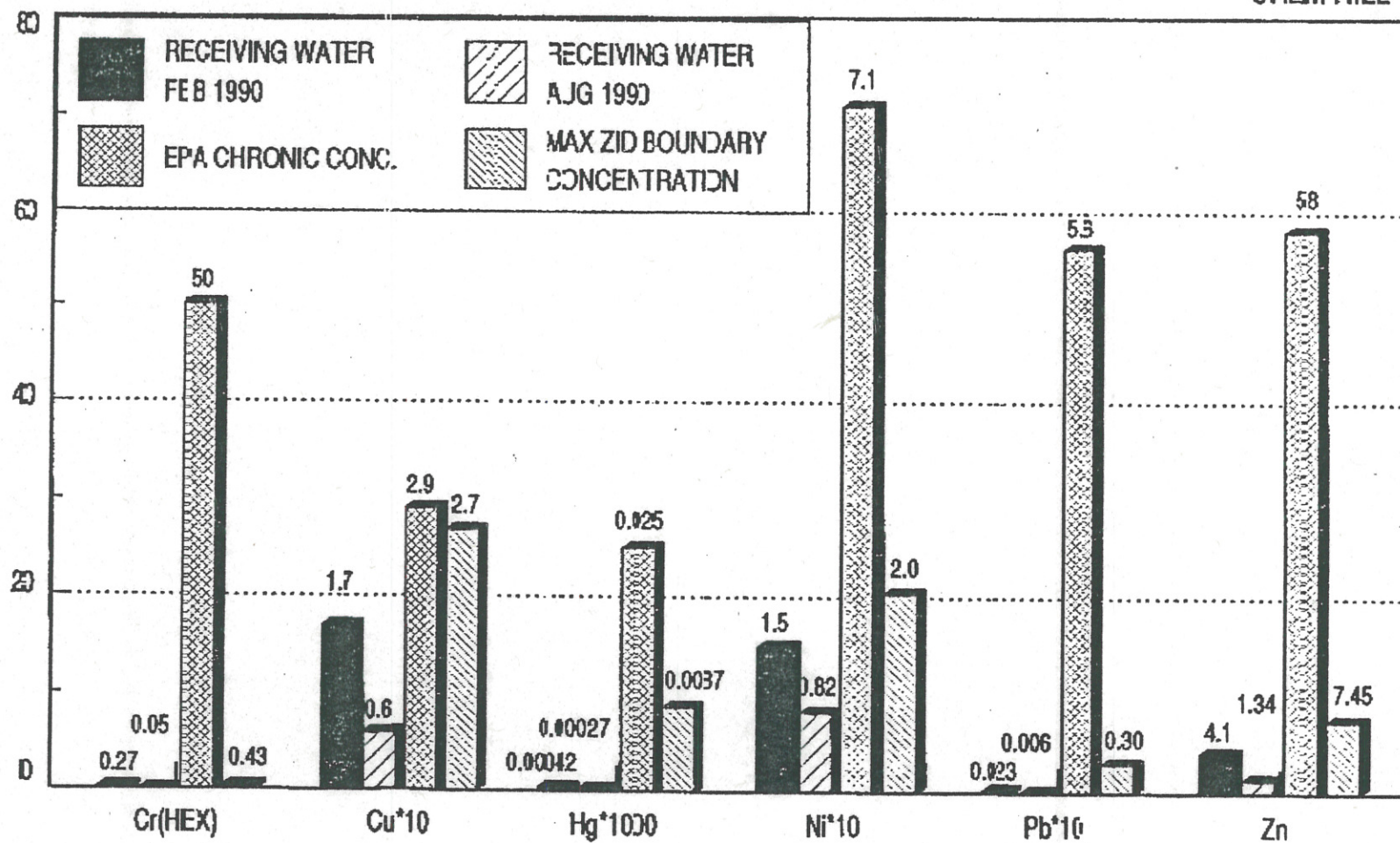
The following table contains data used for the figure:

POINT WORONZOF WWTP NPDES/301(h) RENEWAL RECEIVING WATER DISSOLVED METALS - ug/l - 180:1 DILUTION				
METAL	MAX EFFLUENT CONCENTRAT.	MAX BACKGRD CONCENTRAT.	RECEIVING WATER STD.	MAX ZID BOUNDARY CONC.
Cr+6	30	0.27	50	0.43
Cu	180	1.7	2.9	2.7
Hg	1.5	0.00042	0.025	0.0087
Ni	100	1.5	7.1	2.0
Pb	50	0.023	5.6	0.30
Zn	610	4.1	58	7.5

POINT WORONZOF WWTP 301(h) RENEWAL

RECEIVING WATER DISSOLVED METALS - ug/l

CH2M HILL



2212C:FLDISSOLVED FEB1991

News Wednesday, February 7, 1990

Public Notices 900

PUBLIC NOTICE STATE OF ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION

A petition for a Site Specific Criteria in accordance with 18 Alaska Administrative Code 70.025, has been received by the Department of Environmental Conservation. The details are as follows:

Applicant:
Municipality of Anchorage
3000 Arctic Boulevard
Anchorage, AK 99503-3898

Request: The Municipality of Anchorage has submitted a petition for a Site Specific Criteria for an area in the Cook Inlet off of Point Woronzof, Anchorage, Alaska. The area is approximately 928,000 square meters, and is a circle with a 740 meter radius, and the lower 115° sector removed, and an upper segment removed. The petition is to apply the EPA established Quality Criteria for Water (EPA 440/5-84-001) based on dissolved metal concentrations instead of total recoverable concentrations. The petition has been justified due to sample results of several metals indicating an exceedance of the EPA criteria in the receiving water when total recoverable metals are measured. When dissolved metals are measured in the receiving water, the levels are below the EPA criteria. The Municipality has requested this modification for six metals: chromium, copper, mercury, nickel, lead and zinc. The new criteria will be the same as those established by EPA, but will apply to dissolved metal concentrations as opposed to total recoverable concentrations.

Location of Activity:
Point Woronzof, Anchorage, Alaska

This Activity is identified as AK-002255-1

Any person wishing to present comments regarding this petition may do so by writing to the Department of Environmental Conservation, South-Central Regional Office, 3601 C Street, Suite 1334, Anchorage, Alaska 99503, (907) 563-6529, within 30 days of publication of this notice. A copy of the application may be obtained by writing to the above address.

Public Notices 900

907, Alaska 99503, (907) 563-6529, within 30 days of publication of this notice. A copy of the application may be obtained by writing to the above address.

The Department has tentatively scheduled a public hearing on this petition if it receives requests to hold such a hearing, and it is determined that good cause exists. The hearing is tentatively scheduled to be held on March 12, 1990 at 7:00 PM, at 3000 Arctic Boulevard, Anchorage, Alaska. The hearing will not be held unless it is requested and formally scheduled. Persons interested in attending a hearing should confirm with the Department that it will be held. Residents in the affected area or the governing body of an affected municipality may request a public hearing by writing to the Department of Environmental Conservation, at the above address, within 30 days of publication of this notice.

Dated at Anchorage, Alaska on February 5, 1990.

/s/Robert C. Filini
Programs Manager

Pub: February 7, 8, 1990

AO: 20-219-90

The following goods stored by: Kathryn Rodgers, unit b-42, at Anchorage U-Haul, will be auctioned Friday, February 16, 1990 at 1:00 p.m. by Anchorage U-Haul, 4751 Old Seward Highway.

Pub: February 2 through 11, 1990

The following goods stored by: William Schultz, unit D-25, at Anchorage U-Haul, will be auctioned Friday, February 16, 1990 at 1:00 p.m. by Anchorage U-Haul, 4751 Old Seward Highway.

Pub: February 2 through 11, 1990

The following goods stored by: Robert Shepherd, unit c-22, at Anchorage U-Haul, will be auctioned Friday, February 16, 1990 at 1:00 p.m. by Anchorage U-Haul, 4751 Old Seward Highway.

Pub: February 2 through 11, 1990

Regulations 905

require an increased appropriation.

Notice is also given that anyone interested may present oral or written statements or arguments relevant to the actions proposed in this notice. Written comments should be mailed to Alaska Department of Fish and Game, Division of Boards, P.O. Box 3-2000, Juneau, AK 99802-2000, by 4:30 p.m., March 2, 1990. Written comments may also be submitted to the Joint Board any time before the close of the public hearing beginning at 9:00 a.m., March 12, 1990 in Anchorage at the Anchorage International Airport Inn. An agenda will be posted during the meeting. The board will hear oral testimony only from those who register in Anchorage before the start of the public hearing. Oral statements may be limited to five minutes for individuals and ten minutes for groups.

The Joint Board of Fisheries and Game, will either adopt these or other proposals dealing with the same subject without further notice, or it may decide to amend, repeal, supplement, or take no action on them. In addition, the board may adopt, amend, or delete other regulations on the same subjects incidentally affected by the proposals adopted.

Anyone interested in or affected by the subject matter contained in this legal notice should make written or oral comments if they wish to have their views considered by the board.

Date: February 2, 1990

/s/Don W. Collinsworth,
Commissioner
Alaska Dept. of
Fish and Game

Pub: February 7, 1990

AO: 90-009

Invitations To Bid 910

INVITATION TO LEASE STATE OWNED AGRICULTURAL LAND

The State of Alaska, Department of Natural Resources, Division of Agriculture, Agricultural Revolving Loan Fund, proposes to execute an agricultural rights only lease with

Invitations To Bid

posals; an all applic This disc 11 AAC 3

A public this disc the opin hearing

Pub: Feb 11, 14, 18

AO: 10-8

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